

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

UNITED STATES OF AMERICA,

Plaintiff

V.

THE BOEING COMPANY,

Defendant.

Case No. 4:21-cr-005-O-1

NOTICE BY CONNOLLY RYAN, AS REPRESENTATIVE OF MICHAEL RYAN; EMILY CHELANGAT BABU AND JOSHUA MWAZO BABU, AS REPRESENTATIVES OF JARED BABU MWAZO; CATHERINE BERTHET, AS REPRESENTATIVE OF CAMILLE GEOFFROY; HUGUETTE DEBETS, AS REPRESENTATIVE OF JACKSON MUSONI; LUCA DIECI, AS REPRESENTATIVE OF PAOLO DIECI; BAYIHE DEMISSIE, AS REPRESENTATIVE OF ELSABET MINWUYELET WUBETE; SRI HARTATI, AS REPRESENTATIVE OF ERYANTO; ZIPPORAH KURIA, AS REPRESENTATIVE OF JOSEPH KURIA WAITHAKA; JAVIER DE LUIS, AS REPRESENTATIVE OF GRAZIELLA DE LUIS Y PONCE; CHRIS MOORE, AS REPRESENTATIVE OF DANIELLE MOORE; PAUL NJOROG, AS REPRESENTATIVE OF CAROLYNE NDUTA KARANJA, RYAN NJUGUNA NJOROG, KELLI W. PAULS, AND RUBI W. PAULS; YUKE MEISKE PELEALU, AS REPRESENTATIVE OF RUDOLF PETRUS SAYERS; JOHN KARANJA QUINDOS, AS REPRESENTATIVE OF ANNE WANGUI KARANJA; NADIA MILLERON AND MICHAEL STUMO, AS REPRESENTATIVES OF SAMYA STUMO; GUY DAUD ISKANDER ZEN S., AS REPRESENTATIVE OF FIONA ZEN; AND OTHER SIMILARLY SITUATED REPRESENTATIVES OF THE VICTIMS OF THE CRASHES OF LION AIR FLIGHT JT610 AND ETHIOPIAN AIRLINES FLIGHT ET302 OF

FILING OF EXPERT REPORTS

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(*pro hac vice*)

Attorneys for Victims' Families

**NOTICE BY NAOISE CONNOLLY RYAN ET AL., REPRESENTATIVES OF THE
VICTIMS OF THE CRASHES OF LION AIR FLIGHT JT610 AND ETHIOPIAN
AIRLINES FLIGHT ET302, OF FILING OF EXPERT REPORTS**

Naoise Connolly Ryan et al. (the “victims’ families”), through undersigned counsel, and pursuant to this Court’s scheduling order (Dkt. 64), hereby give notice of the filing of expert reports for three witnesses: (1) Vickie Norton; (2) Chris Keyes; and (3) Dr. Rune Storesund, whose expert reports are attached as Exhibits 1, 2, and 3 respectively.

In light of this filing, all briefing in this case has been completed on the victims’ families’ four pending motions: (1) Second Amended Motion for Findings the Proposed Boeing Deferred Prosecution Agreement was Negotiated in Violation of Victims’ Rights (Dkt. 52); (2) Motion for Exercise of the Court’s Supervisory Powers over the Deferred Prosecution Agreement (Dkt. 17); (3) Motion for an Arraignment of Boeing (Dkt. 18); and (4) Motion for Disclosure of Relevant Evidence to Prove “Victim” Status (Dkt. 72).

Dated: March 31, 2022

Respectfully submitted,

/s/ Warren T. Burns

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CERTIFICATE OF SERVICE

I certify that on March 31, 2022, the foregoing document was served on the parties to the proceedings via the Court's CM/ECF filing system.

/s/ Paul G. Cassell
Paul G. Cassell